



LAW OFFICE OF
JOSHUA D. KIRSHNER, PLLC

666 Old Country Road, Suite 501
Garden City, NY 11530

T: (212) 756-1277

jkirshner@jkirshnerlaw.com
www.jkirshnerlaw.com

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VIA ECF

Hon. Katharine J. Parker
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Collado, et al. (Ramona Rodriguez) 21-mj-4834

Dear Judge Parker,

~~MEMO ENDORSED~~

I represent Ramona Rodriguez in the above-captioned matter. I write to request a modification to her conditions of release. Specifically, we request the temporary return of Ms. Rodriguez' passport so that she may travel to the Dominican Republic for approximately seven days to visit her terminally ill father. Should the Court grant the instant application, Ms. Rodriguez will provide Pre-trial Services with an itinerary of her travel and return the passport to Pre-trial Services within seven days of her return.

I have reached out to the Government and Pre-Trial Services regarding this application and both take no position. Notably, Ms. Rodriguez is in full compliance with all of the conditions of her release.

Thank you for your consideration and attention to this matter.

Respectfully submitted,

/s/

Joshua D. Kirshner

cc: All parties (via ECF)